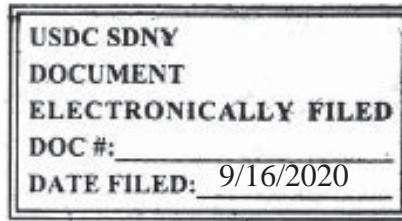


Hon. Alison J. Nathan
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007



September 12, 2020

Re: Heena Shim-Larkin v. City of New York
Docket No. 16 CV 6099 (AJN) (KNF)
Request for an extension of time

Dear Judge Alison J. Nathan:

I am Plaintiff Heena Shim-Larkin and writing to request for an extension of time to file Rule 72(a) objection concerning the order dated April 14, 2020, until October 12, 2020, pursuant to Your Honor's individual rules of practice 1.D. The current due date is September 21, 2020. This is the ninth request and the previous requests were granted. See orders at ECF #625, 635, 638, 645, 647, 650, 653, and 655. Defendant's counsel Dominique Saint-Fort wrote an email that Defendant takes no position on Plaintiff's request. From September 9th through 11th, Plaintiff asked Saint-Fort the reason for not consenting, via emails and phone call, which led to voicemail. But Defendant did not provide any reason.

New York County Court is still under Phase 3 according to New York State Court website¹. Plaintiff has been calling the New York County Court law library every week and it is still closed without projected reopening date. Therefore, Plaintiff wishes to wait three more weeks. If the library opens on or about September 28, 2020, Plaintiff will need 2 weeks from that date. Additionally, Plaintiff was not able to find any projected date for New York Public Library's research center reopening. Conducting legal research at law library is necessary for Plaintiff to prepare Rule 72(a) objection. If the library does not open beyond September 28, 2020, Plaintiff might request additional extension(s) later on.

Accordingly, Plaintiff respectfully requests that the Court to extend the date for Plaintiff to file Rule 72(a) objection concerning the order dated April 14, 2020 until October 12, 2020 and order other reliefs which court deems just and proper.

SO ORDERED
Respectfully submitted,
S/
Heena Shim-Larkin
Plaintiff *Pro Se*

9/15/2020

¹ <http://www.nycourts.gov/limited-filings.shtml>